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January 8, 2020

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 6W
Trenton, New Jersey 08608

**Re: *Par Pharmaceutical, Inc., et al. v. Sandoz Inc.*
 Civil Action No. 3:18-cv-14895-BRM-DEA (D.N.J.)**

Dear Judge Martinotti:

This firm, together with Brinks Gilson & Lione, represents Defendant Sandoz Inc. (“Sandoz”) in the above-captioned matter. On July 19, 2019, Sandoz and Plaintiffs Par Pharmaceutical, Inc., Par Sterile Products, LLC, and Endo Par Innovation Company, LLC (collectively, “Par”) filed their Joint Claim Construction and Prehearing Statement (D.E. 48). The Parties have since reached agreement on the construction of one claim term. Specifically, Sandoz has agreed to Par’s construction of “wherein the human’s mean arterial blood pressure is increased within 15 minutes of administration,” as shown in the table below. Sandoz agrees to the construction below for purposes of reducing the disputed issues in this case only. Sandoz’s agreement in this case is not a concession as to the meaning of this term, or similar terms, in any other case or as to any other patents.

Accordingly, we respectfully request that the Court adopt the following construction:

Term for Construction	Claims	Parties’ Agree-Upon Proposed Construction
“wherein the human’s mean arterial blood pressure is increased within 15 minutes of administration”	’239 patent, claim 5 ’478 patent, claim 3 ’526 patent, claim 5	Ordinary meaning, no construction necessary (e.g. wherein the mean arterial blood pressure of the human in need of having his or her blood pressure increased is increased within the first 15 minutes after the claimed vasopressin composition has been administered to him or her)

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The remaining claim terms set forth in the Joint Claim Construction and Prehearing Statement remain in dispute.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Eric Abraham
ERIC ABRAHAM

CC: ALL COUNSEL OF RECORD (VIA ECF)